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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Yer Vang,  
Plaintiff,  
vs.  
Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

} Case No. 1:22-cv-01101-SKO  
} STIPULATION AND ORDER FOR  
} EXTENSION OF TIME  
(Doc. 14)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from February 13, 2023 to April 14, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists.

For the weeks of February 13, 2023 and February 20, 2023, Counsel currently has 16 merit briefs, and several letter briefs and reply briefs. Additional time is needed to thoroughly brief this matter for the Court.

Additionally, Counsel for Plaintiff is currently taking partial leave as his child was born on October 14, 2022. Thus, Counsel is working limited hours for the months of December 2022 through March 2023 (with a possible extension).

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: February 9, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena  
JONATHAN OMAR PENA  
Attorneys for Plaintiff

Dated: February 9, 2023

PHILLIP A. TALBERT  
United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

By: \*s/ Margaret Lehrkind  
Margaret Lehrkind  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on February 9, 2023)

## ORDER

Based upon the foregoing stipulation of the parties (Doc. 14), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including April 14, 2023, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 5) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **February 10, 2023**

*/s/ Sheila K. Oberto*

**UNITED STATES MAGISTRATE JUDGE**